



E. MARTIN ESTRADA
United States Attorney
DAVID T. RYAN
Assistant United States Attorney
Chief, National Security Division
SARAH E. GERDES (Cal Bar No. 306015)
Assistant United States Attorneys
Deputy Chief, Terrorism and Export Crimes Section
1500 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-4699
E-mail: sarah.gerdes@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHENGHUA WEN,

Defendant.

CR 2:24-MJ-07105-DUTY

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING THE COMPLAINT,
UNDERLYING COMPLAINT AFFIDAVIT,
AND THE GOVERNMENT'S NOTICE OF
REQUEST FOR DETENTION; DECLARATION
OF SARAH E. GERDES

(UNDER SEAL)

The government hereby applies ex parte for an order that the Complaint, underlying Complaint affidavit, and the Government's Notice of Request for Detention be kept under seal until December 3, 2024, at 6:00 a.m. PST, at which point the Complaint, underlying Complaint affidavit, and the Government's Notice of Request for Detention shall be automatically unsealed.

//

//

//

1
2 This ex parte application is made pursuant to Federal Rule of
3 Criminal Procedure 6(e)(4) and is based on the attached declaration
4 of Sarah E. Gerdes.

5 Dated: November 26, 2024

Respectfully submitted,

6 E. MARTIN ESTRADA
United States Attorney

7
8 DAVID T. RYAN
Assistant United States Attorney
Chief, National Security Division

9
10 /s/ Sarah E. Gerdes

11 SARAH E. GERDES
Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF SARAH E. GERDES

I, Sarah E. Gerdes, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys assigned to represent the government in the prosecution of United States v. Shenghua Wen, for which the Complaint, underlying Complaint affidavit, and the Government's Notice of Request for Detention are being filed concurrently with this Ex Parte Application.

2. Defendant has not been taken into custody on the charge contained in the Complaint. The likelihood of apprehending defendant would be seriously jeopardized if the Complaint, underlying Complaint affidavit, and the Government's Notice of Request for Detention in this case were made publicly available before defendant is taken into custody.

3. The government anticipates that it will arrest defendant on December 3, 2024, and will execute various search warrants that same day. The government also anticipates conducting interviews of persons associated with defendant throughout the day on December 3, 2024. The execution of those warrants and interviews may be jeopardized if knowledge of the Complaint, underlying Complaint affidavit, and the Government's Notice of Request for Detention becomes public before the government is able to complete its operation.

//

//

1
2 4. Accordingly, the government requests that the Complaint,
3 underlying Complaint affidavit, and the Government's Notice of
4 Request for Detention be sealed and remain so until 6:00 a.m. PST on
5 December 3, 2024.

6 5. I declare under penalty of perjury under the laws of the
7 United States of America that the foregoing is true and correct and
8 that this declaration is executed at Los Angeles, California, on
9 November 26, 2024.

10 /s/ Sarah E. Gerdes

11

SARAH E. GERDES